

Exhibit A



BALDASSARE & MARA, LLC

10.30.2024

Christian Joseph (paralegal)

Marguerite Colson

Rachel Kull (BOP)

- Saw news article re claim of withheld evidence.
- Inquiry from BOP court liaison re hard drive allegedly not delivered
- Hard drive log reflects that Paduch signed for hard drive on August 21
- Have no record from counsel saying that the hard drive was not *given* to DAP
 - RK did not respond to April 22 and 26 inquiries from counsel; Sophia did. Emails from counsel appear to raise issue of *how* to access the materials on the hard drive-- not that DAP was never given the hard drive. That is why BOP responded that the facility was not responsible for uploading.
- Second drive that Paduch received, so he would have known process for checking out and accessing.